

materials include metal such as nickel and resins such as polyethylene terephthalate, polyurethane resin and polycarbonate resin. Tarumi et al. does not teach a belt component as claimed. Instead, Tarumi et al. teaches a toner carrier roller having a cylindrical substrate. Also, Tarumi et al. does not teach the substrate materials as claimed, including fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomers, nitrile rubbers, and mixtures thereof. In addition, Tarumi et al. does not teach or suggest use of a thiophene-based material as a coating.

Jonas et al. is relied upon as teaching a thiophene-based. Applicants submit that one of ordinary skill would not have been motivated to combine the references because Tarumi et al. teaches an intermediate transfer member, whereas Jonas et al. relates to conductive polythiophene formulations for electrodes in electroluminescent displays or for solid capacitors, and for picture production such as silver halide photography dry-plate systems and electrophotography.

In addition, even if the references were combined, the combination would not teach the elements of the claims because Jonas et al. does not teach the deficiencies of the primary reference. Specifically, Jonas et al. does not teach a xerographic belt component. In addition, regarding claim 24, Jonas et al. does not teach the specifically recited preferred fluoropolymers of the claim 24 embodiment.

In view of the above arguments, Applicants submit that the present claims are not rendered obvious over Tarumi et al. in view of Jonas et al.

Regarding the combination of Tarumi et al., in view of Jonas et al. and Newkirk, Applicants have the following comments.

Applicants submit that one of ordinary skill in the art would not have been motivated to combine these three references because of their diverse teachings. Specifically, Jonas et al. relates to thiophene-based materials useful for coating electrodes in the electrical arts and for use in picture production. Tarumi et al. relates to intermediate transfer member coatings. Newkirk relates to fuser member coatings. One of ordinary skill in the art would not have been motivated to use as a substrate, an intermediate coating of an intermediate transfer member as taught by

Tarumi et al., and substitute a specific fluoroelastomer of a fuser member for that coating, and subsequently coat the fluoroelastomer with a thiophene-based material taught as useful as a coating in the electrical arts and for picture making as taught by Jonas et al. To make such changes to each of the references and end up with the claimed invention could only be achieved in hindsight.

Newkirk does teach a belt component as depicted in Figure 5 of the reference. However, as set forth in column 11, lines 1-3 of Newkirk, the belt comprises a support layer (substrate) of heat conductive material such as metal. Therefore, Newkirk teaches away from using a polymeric material for the substrate as claimed. The three references have diverse teachings of substrates including 1) a toner carrier roller (Tarumi et al.) having substrate materials including fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomers, nitrile rubbers, and mixtures thereof, 2) electrode substrates of glass or plastic films (e.g., polyesters such as polyethylene terephthalate or polyethylene naphthalate, polycarbonate, polyacrylate, polysulphone or polyimide) (Jonas et al.), and 3) belt substrates of metal. Applicants submit that one of ordinary skill, faced with the combination of diverse teachings of substrates would not have been motivated to combine the references.

In view of the above arguments, Applicants submit that the claims are not obvious over Tarumi et al. in view of Jonas et al. and Newkirk.

Regarding the combination of Tarumi et al. in view of Jonas et al. and Chen, Applicants have the following comments.

Chen et al. teaches a layer for use in fuser members. Chen et al. teaches a fuser roller having a thermoset resin or rigid metal core (column 4, line 63-column 5, line 3). Applicants submit that one of ordinary skill in the art would not have been motivated to combine such diverse references relating to fuser members (Chen et al.), intermediate transfer members (Tarumi et al.), and electrodes in picture production or electrophotography (Jonas et al.). Further, none of the references cited teach or suggest the claimed belt substrate.

Further, even if the references were combined, the resulting combination would not include a belt substrate as claimed. Chen et al., instead, teaches a rigid metal core substrate.

In view of the above arguments, Applicants submit that the present claims are not obvious in view of the combination of Tarumi et al. in view of Jonas et al. and Chen et al.

Regarding the combination of Tarumi et al. in view of Krafft et al., Applicants have the following comments.

Krafft et al. teaches photographic materials including film supports of cellulose and polycarbonates (column 2, lines 62-64). Applicants submit that one of ordinary skill would not have been motivated to combine references with such different teachings such as 1) a toner carrier roller (Tarumi et al.) having substrate materials including fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomers, nitrile rubbers, and mixtures thereof, and 2) photographic film supports of cellulose acetate, polycarbonates and polyesters (Chen et al.)

Further, even if the references were combined, the combination would not teach or suggest the claimed belt substrate. Instead, Krafft et al. teaches photographic film supports.

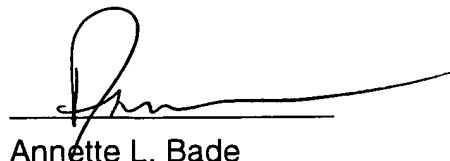
Accordingly, Applicants submit that the present claims are not obvious over Tarumi et al. in view of Krafft et al.

In view of the above arguments, Applicants submit that all claims should now be in condition for allowance. Early indication of allowability is respectfully requested.

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation Attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, s/he is hereby authorized to call Applicant's Attorney, Annette L. Bade, at telephone number (310) 333-3682, El Segundo, California.

Respectfully submitted,



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December 19, 2000
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